



[4830-01-p]

## DEPARTMENT OF THE TREASURY

Internal Revenue Service

26 CFR Part 1

[TD 9733]

RIN 1545-BJ49

United States Property Held by Controlled Foreign Corporations in Transactions Involving Partnerships; Rents and Royalties Derived in the Active Conduct of a Trade or Business; Correction

AGENCY: Internal Revenue Service (IRS), Treasury.

ACTION: Final and temporary regulations; correction.

SUMMARY: This document contains corrections to final and temporary regulations (TD 9733) that were published in the **Federal Register** on September 2, 2015 (80 FR 52976). The temporary regulations are regarding the treatment as United States property of property held by a controlled foreign corporation in connection with certain transactions involving partnerships.

DATES: This correction is effective on **[INSERT DATE OF PUBLICATION OF THIS DOCUMENT IN THE FEDERAL REGISTER]** and applicable beginning September 2, 2015.

FOR FURTHER INFORMATION CONTACT: Rose E. Jenkins at (202) 317-6934 (not a toll free number).

SUPPLEMENTARY INFORMATION:

### **Background**

The final and temporary regulations (TD 9733) that are the subject of this correction are under sections 954 and 956 of the Internal Revenue Code.

### **Need for Correction**

As published, the final and temporary regulations (TD 9733) contain errors that may prove to be misleading and are in need of clarification.

### **Correction of Publication**

Accordingly, the final and temporary regulations (TD 9733), that are the subject of FR Doc. 2015-21574, are corrected as follows:

1. On page 52977, in the preamble, the first column, under the paragraph heading “Background”, the second line of the paragraph, the language “to 26 CFR part 1 under of the Internal” is corrected to read “to 26 CFR part 1 under section 956 of the Internal”.
2. On page 52979, in the preamble, the second column, the first line of the column, the language “the active development test in §§ 1.954-” is corrected to read “the active development test in § 1.954-”.
3. On page 52979, in the preamble, the second column, the twentieth line of the column, the language “§§ 1.954-2T(c)(2)(iii)(E), (c)(2)(viii),” is corrected to read “§ 1.954-2T(c)(2)(iii)(E), (c)(2)(viii),”.
4. On page 52979, in the preamble, the second column, the twelfth line from the bottom of the column, the language “that such rents or royalties that are” is corrected to read that such rents or royalties are”.

Martin V. Franks  
Chief  
Publications and Regulations Branch  
Legal Processing Division  
Associate Chief Counsel  
(Procedure and Administration)

[FR Doc. 2015-27604 Filed: 10/28/2015 8:45 am; Publication Date: 10/29/2015]